



CDSS

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DEPARTMENT OF SOCIAL SERVICES
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ARNOLD SCHWARZENEGGER
GOVERNOR

May 4, 2009

Ms. Susan Wilson, Director
Mendocino County
Department of Social Services
737 South State Street
Ukiah, CA 95482-1060

Dear Ms. Wilson:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of Mendocino County. Enclosed is the final report on the review.

There were some compliance issues identified in the report, which will require the development of a corrective action plan. Please submit your plan within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a request since our report is a public document. If you would like us to include a copy of your corrective action plan when responding to these requests, please indicate this when submitting your plan.

If you need technical assistance in the development of your plan, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Pat Meek, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR MENDOCINO COUNTY
DEPARTMENT OF SOCIAL SERVICES
Conducted
October 22 – 23, 2008**

**California Department of Social Services
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**Reviewer
Daniel Cervantes**

TABLE OF CONTENTS

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. CONCLUSION**

CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Mendocino County Department of Social Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on October 22-23, 2008. A brief, informal exit interview was held with Colleen Gormian and Program Directors on October 23, 2008 to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Family and Children's Services	727 S. State Street, Ukiah Yokayo Center	Children's Services	Spanish
Employment and Family Assistance Services	737 S. State Street, Ukiah Yokayo Center	NAFS, CalWorks	Spanish
Adult and Aging Services	747 S. State Street, Ukiah Yokayo Center	APS, IHSS	Spanish
Willits Integrated Services Center	221 S Lenore Ave, Willits	Various	None

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2007-2008 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff

- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	5	2
Children Social Workers	0	0
Adult Program Workers	4	0
Receptionist/Screeners	4	2
Total	13	4

All scheduled interviews were conducted.

Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

Reviewed Case Files

English speakers' case files reviewed	3
Non-English or limited-English speakers' case files reviewed	26
Languages of clients' cases	English, Spanish

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Many programs offer special appointment times to clients that cannot meet during regular business hours. CWS offers evening parenting classes.
Does the county have extended hours to accommodate clients?	X			The Ukiah EFAS office offers extended hours. (7:00 AM – 5:00 PM)
Can applicants access services when they cannot go to the office?	X			Some programs allow phone applications. Other special accommodations can be made by county staff to suit the client's needs.
Does the county ensure the awareness of available services for individuals in remote areas?	X			The county offers information at http://www.mendocinoresources.com/ . CWS distributes monthly calendars to local schools, health clinics, etc. More outreach is provided through public service announcements.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X			Workers always provide and explain the PUB 13 at intake and again at recertification. Adult Programs social workers explain the PUB 13 at first home visit with the client.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?			X	727 S. State Street in Ukiah <u>did not</u> have the PUB 13 available in the lobby. 737 S. State Street in Ukiah <u>did not</u> have the PUB 13 available in the lobby. 747 S. State Street <u>did</u> have the PUB 13 available in the lobby. 221 S. Lenore Ave <u>did</u> have the PUB 13 available, but the receptionist was not able to tell me where they were located.
Was the Pub 13 available in large print, audiocassette and Braille?		X		727 S. State Street in Ukiah <u>did not</u> have these versions of the PUB 13 available.
		X		737 S. State Street in Ukiah <u>did</u> have these versions of the PUB 13 available. Both receptionists knew where to find them.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
	X			747 S. State Street in Ukiah <u>did</u> have these versions of the PUB 13 available.
	X			221 S. Lenore Ave <u>did not</u> have the Braille or the Audio versions of the PUB 13. The large print was available in the seating area of the lobby.
Were the current versions of the required posters present in the lobbies?		X		727 S. State Street in Ukiah <u>did not</u> have the current version of the <i>And Justice for All</i> poster (dated 03/98.) PUB 86 was current.
		X		737 S. State Street in Ukiah <u>did</u> have both posters, but the <i>And Justice for All</i> poster was printed on a regular 8.5 x 11 sheet of paper. PUB 86 was <u>not</u> current.
		X		747 S. State Street had an outdated PUB 86. The <i>And Justice for All</i> poster was printed on a regular 8.5 x 11 sheet of paper.
		X		221 S. Lenore Ave had an outdated PUB 86 poster (03/98.) The <i>And Justice for All</i> poster was printed on a regular 8.5 x 11 sheet of paper.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?		X		At all of the facilities visited, the first contact person <u>did not</u> know where the CRC's information was posted for the public. However, all of the workers knew how to get a hold of the CRC.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			All necessary signage was available in the threshold languages.

B. Corrective Actions

Informational Element	Corrective Action Required
Translated Pub 13	Mendocino County shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2
Auxiliary aids	Mendocino County shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Posters	Mendocino County shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211

C. Recommendation

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 727 S. State St., Ukiah

Facility Element	Findings	Corrective Action
Parking	2 accessible spaces	
	No van accessible parking space	One in every 8 accessible spaces (no fewer than 1) shall be designated van accessible. (CA T24 1129B.4.2, ADA 4.1.2(5)(b)) pp. 135, 136
	No freestanding sign designating accessible parking	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133 Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.5) p. 133
	Accessible parking space too short at 17 ft	Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135
	Accessible parking space not wide enough at 8.5 feet	Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135
	"No Parking" not painted in access aisle	The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135

Outside signage	No ADA accessible sign at front entrance	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353
Restroom	<p>Men's: Toilet protector too high at 42 inches</p> <p>Woman's: Toilet protector too high at 42 inches</p>	<p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269</p>

Facility Location: 737 S. State St., Ukiah

Facility Element	Findings	Corrective Action
Parking	<p>1 accessible space</p> <p>Access aisle not wide enough at 5 ft</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135</p> <p>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135</p>

	<p>Accessible sign too low at 26 inches</p> <p>"No Parking" not painted in access aisle</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p 133</p> <p>Wall signage shall be centered 36" minimum above grade, ground, or sidewalk at the interior end of space. (CA T24 1129B.5) p. 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135</p>
Restroom	<p>Men's: Toilet protector too high at 48 inches</p>	<p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA-ACRM 1115B.9.2 and CA-ACRM 1115B.9.1.2, ADA 4.19.6) p. 269</p>

Facility Location: 747 S. State St., Ukiah

Facility Element	Findings	Corrective Action
Parking	<p>1 accessible space</p> <p>Access aisle not wide enough at 5 ft</p>	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135</p> <p>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135</p>

	"No Parking" not painted in access aisle	The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135
Restroom	<p>Men's: Force to open door exceeds 5 lb maximum at 9 lbs</p> <p>Woman's: Force to open door exceeds 5 lb maximum at 10 lbs</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p>

Facility Location: 221 S Lenore Ave, Willits

Facility Element	Findings	Corrective Action
Exterior entrance		
Outside signage	No ISA sign indicating the building is wheelchair accessible	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual

applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			The client's language needs are self declared by filling out form MCDSS 1154.
Does the county use a primary language form?	X			Form MCDSS 1154
Does the client self-declare on this form?	X			Form MCDSS 1154 is filled out, signed, and dated by the client.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?				Non- English- or limited-English-speaking clients are assigned bilingual workers. When a bilingual worker is not available, workers use the language line to communicate with the client(s).
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			All of the workers interviewed were well aware of the language line when an in-house interpreter was not available.
Are county interpreters determined to be competent?	X			Interpreters must be certified by the county.

Question	Yes	No	Some-times	Comments
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?	X			One worker said they allowed minors as young as 12 years old to translate in emergency situations. Three workers said they allowed minors as young as 16 to translate regardless of the circumstances. The rest of the workers that were asked if minors were allowed to be interpreters said that in "no circumstance" does the county allow minors to interpret.
Does the county allow the client to provide his or her own interpreter?	X			Clients that use their own interpreter are required to fill out form MCDSS 1158 <i>Notice of Understanding Use of a Self-Provided Interpreter</i> .
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Form MCDSS 1158 <i>Notice of Understanding Use of a Self-Provided Interpreter</i> ensures that the interpreter understands the possibility of ineffective communication. Also, see comments above.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Many of the forms available to the workers in English are also available in Spanish.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			

Question	Yes	No	Some-times	Comments
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			The county offers reading and writing assistance for clients that need help. Also, both clients and workers have access to TDD machines.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Workers assist clients who cannot read/write.
Does the county offer screening for learning disabilities?	X			
Is there an established process for offering screening?	X			

B. Corrective Actions

N/A

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	Soc 295	SAWS 1	SAWS 1
Primary language documentation	Soc 295	SAWS 1, MCDSS 1154	SAWS 1, MCDSS 1154

Documented Item	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Method of providing bilingual services and documentation	MCDSS 1154, case narrative	MCDSS 1154	MCDSS 1154
Client provided own interpreter	MCDSS 1158, case narrative	MCDSS 1158, case narrative	MCDSS 1158, case narrative
Method to inform client of potential problem using own interpreter	MCDSS 1158, verbal	MCDSS 1158, verbal	MCDSS 1158, verbal
Release of information to Interpreter	MCDSS 1157	MCDSS 1157	MCDSS 1157
Individual's acceptance or refusal of written material offered in primary language	MCDSS 1154	MCDSS 1154	MCDSS 1154
Documentation of minor used as interpreter	Case narrative	Case narrative	Case narrative
Documentation of circumstances for using minor interpreter temporarily	Case narrative	Case narrative	Case narrative
Translated notice of actions (NOA) contain translated inserts	N/A	N/A	N/A
Method of identifying client's disability	MCDSS 1154	MCDSS 1154	MCDSS 1154
Method of documenting a	MCDSS 1154, case narrative	MCDSS 1154, case narrative	MCDSS 1154, case narrative

Documented Item	Adult Programs	CalWORKs	Non-Assisted Food Stamps
client's request for auxiliary aids and services			

B. Corrective Actions

Areas of Action	Corrective Action
General	Mendocino County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Most of the employees interviewed were trained a month prior to their phone interview. Mendocino county offers various forms of training for all employees annually.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?		X		Although the majority of the employees knew very well how to handle a discrimination complaint, three employees interviewed did not know who the Civil Rights Coordinator was. Those same employees referred discrimination complaints to their supervisors.

Does the county provide employees Cultural Awareness Training?	X			Cultural awareness training is offered in conjunction with Division 21 training. Please see comments in Division 21 training.
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			MEPA training is offered at the beginning of employment.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

N/A

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?			X	Most of the workers interviewed were able to differentiate the three complaints. Four workers had trouble defining a program complaint and a personnel complaint.
Did the employees know who the Civil Rights Coordinator is?		X		Three workers interviewed did not know who the Civil Rights Coordinator was.

Interview and review areas	Yes	No	Some-times	Findings
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?		X		A little more than half of the workers knew where the posters were located in the lobby. The rest of the workers were not able to give me the location of the posters. Two workers did not even know posters with this information were available in the lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Discrimination Process	Mendocino County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203
Civil Rights Coordinator	Mendocino County shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

IX. CONCLUSION

The CDSS found the Mendocino County Department of Social Services in overall compliance with CDSS Division 21 Regulations, and other applicable state and federal laws with some exceptions. The CDSS would like to thank Ms. Pat Meek and Ms. Colleen Gorman for their cooperation and assistance in coordinating the review. The workers interviewed throughout the county were very friendly and a pleasure to speak to.

It is evident that Mendocino County delivers adequate language services to clients. But, with the exception of the Adult Services, the case files reviewed lacked thorough documentation. In cases where the bilingual worker has provided interpreter service, there is very little to no documentation to validate the delivery of interpretive services. Other cases had the MCDSS 1154 signed by the client, but no documentation was evident throughout the rest of the case. Staff development and the importance of thorough documentation was the focus at the brief exit meeting with Colleen and program managers.

It should be noted that although many of the past facility deficiencies from the 2005 review have been corrected, there still are numerous repeat facility violations that must be addressed. Many of the same parking lot issues at the Ukiah facilities were found to be uncorrected since the last review.

Mendocino County must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the deficiencies.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance deficiencies and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.